# THE ADVISOR

A Publication of the Rocky Flats Citizens Advisory Board

Fall 1999

## Kaiser-Hill Plots a Course for 2006 Closure

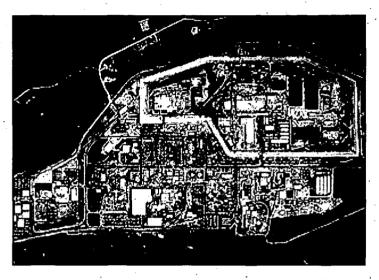
n 1997, Secretary of Energy Federico Peña designated the Rocky Flats Environmental Technology Site (RFETS) as an accelerated closure site. This designation challenged Rocky Flats federal employees and their contractors to clean and close RFETS by 2006. The site operates under a baseline plan that details the scope, schedule, and costs of 20,000 work elements, grouped into 29 general projects. This baseline has assumed a 2010 closure date with a total cost to taxpayers of \$7.3 billion. In May 1999, Kaiser-Hill, the site integrating management contractor, completed a baseline for the closure of the site by the end of calendar year 2006 at a total cost of \$6.75 billion.

Both versions of the baseline are guided by seven basic principles:

- 1) Eliminate the most urgent risks;
- 2) Reduce mortgage and support costs to free up funds for further risk reduction;
- 3) Protect worker health and safety;
- 4) Reduce the generation of wastes;
- 5) Create a collaborative relationship between DOE and its regulators and stakeholders;
- 6) Focus science and technology development on cost and risk reduction; and
- 7) Integrate waste treatment and disposal across sites.

The baselines also enable the site to achieve the endstate that is defined in the Rocky Flats Cleanup Agreement (RFCA). RFCA states that at closure all special nuclear materials and radioactive wastes will be removed from the site; all facilities will be demolished; cleanup will allow the use of the site for open space and limited industrial use; and that all water on and leaving the site will be suitable for any and all uses.

One of the major obstacles that the site must overcome to accelerate the closure from 2010 to 2006 is the removal of the special nuclear materials - those materials that pose a significant security risk at the site. So long as they remain onsite, many precautions must be in place to safeguard these materials. Once the SNM is removed, the site will be able to



This aerial view of the Rocky Flats industrial area demonstrates how much work needs to be done before 2006, at which time all of the buildings will be gone under current plans. (Note: This is a 1991 photo, a few structures have since been removed)

substantially reduce security requirements. This will allow management to divert more funding to cleanup activities. Under the 2006 baseline, the removal of this material will be significantly accelerated from 2004 to 2002.

In addition to reducing security requirements onsite, the 2006 baseline proposes to speed the cleanup in a number of additional ways. The site hopes to employ the use of a second shift of workers to allow an around-the-clock workforce. Cutting contaminated equipment to meet size restrictions for waste receiver locations will be centralized and workers will use some type of remote handling (e.g. robotics or hand extensions). This will allow the site to remove equipment from buildings more quickly and increase worker safety. The site also hopes to perform deactivation and decommissioning projects in parallel rather than in sequence.

(continued on page 3)

## Highlights Inside:

Rocky Flats Updates	2
ComRad Program	3
Plutonium Status Report	4

Northern New Mexico Citizens Advisory Board6
Meet the Board's Newest Members7
Public Meeting Calendar8

## **Rocky Flats Updates**



# DOE to Renegotiate Kaiser-Hill Contract through Closure

The Department of Energy announced in early August that it plans to renegotiate the Rocky Flats integrating management contract it has with Kaiser-Hill. The renegotiated contract will be developed around the goal of completing cleanup by 2006 (see cover story on 2006 baseline plan). DOE has stated that this approach will give it the best chance of successfully completing cleanup at Rocky Flats by 2006.

#### Rocky Flats Health Study Complete

The Rocky Flats Historical Public Exposures Studies concluded in late August. This study sought to determine the expected public health effects related to contaminant releases from Rocky Flats through 1989. Researchers reconstructed accidental and routine release events from Rocky Flats to estimate how much material was emitted from the site, and then performed risk analyses to determine potential health effects to people living in the community during those years. The overall results showed very low risk levels for all individuals potentially impacted by materials originating at Rocky Flats. A great deal of information about the study, including a short video, are available. Contact Ann Lockhart at (303) 692-2640 for more information. Additionally, the Citizens Advisory Board will hosting a presentation of the study's results at its October 7 meeting.

#### Radionuclide Soil Action Levels Review Proceeds

The independent review of the Rocky Flats radionuclide soil action levels is nearing completion. A community oversight panel hired Risk Assessment Corporation (RAC) to perform the review of how the levels were developed as well as an independent soil action level calculation. RAC has submitted draft reports for all but one of the five tasks it was asked to perform. These tasks involved reviewing action levels at other nuclear sites, determining which computer model to use, suggesting parameter values to use in the chosen model, and recommending sampling methods to ensure that the action levels are met after remediation. The one task that remains is the independent soil action level calculation itself. RAC will present its draft report for this task at the Panel's monthly meeting on September 9 at Broomfield City Hall between 4 and 7 p.m. After completion of this report, RAC and the panel will finalize the project reports, develop a project summary, and hold a public meeting to convey the study results. Those interested in finding out more about the progress of the project are invited to a public update meeting scheduled for Wednesday, September 8 from 6:30 to 9:00 p.m. at Broomfield City Hall.

#### Transuranic Waste Shipments Continue; Storage Plans Made

Rocky Flats continues to send about one shipment of transuranic waste to WIPP per week. Regardless of the pace of shipments to WIPP, Rocky Flats' planners have determined they will need at least some additional onsite storage capacity for TRU waste by 2000. Therefore, the site prepared an Environmental Assessment which

analyzed several potential options, including building a new facility, refurbishing existing facilities, and utilizing tents for storage. The preferred alternative in the EA is to refurbish existing buildings. RFCAB submitted comments supporting the preferred alternative, while highlighting some areas of concern.

#### RFCAB Offers Cleanup Vision

Beginning in October 1998, the Citizens Advisory Board embarked on an ambitious project - developing a "Vision" for the cleanup of Rocky Flats. For nearly a year, the Board met twice each month to discuss the overall cleanup strategies for Rocky Flats and determine its own preferences. The result of this comprehensive effort is a 12-page document that describes the year-long process and offers a community-based perspective on the type of cleanup that should be accomplished at Rocky Flats. This document will be available in September or October and will be mailed to those who have expressed an interest in the Board's . activities. If you are interested in . receiving a copy, please contact the RFCAB office at (303) 420-7855 or email us: rfcab@indra.com.

# Board Seeking Work Plan Issues for Next Year

Now that the Vision document has been completed, the Board is currently in the process of developing a work plan for 2000. As part of this process, the Board would like to solicit input from interested community members. Do you have suggestions for what the Board should study and work on during the next year? If so, please let us know by September 30, 1999.

## RFCAB Assumes Contract Management for ComRad Program

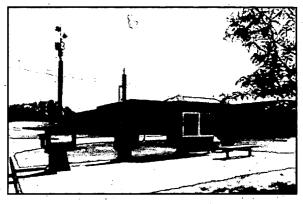
arly this spring, the Citizens
Advisory Board became the
contract manager for the
Community Radiation Monitoring
Program, or ComRad, as it is known.
DOE and the local community governments started ComRad in 1990. The
program involves five monitoring
stations located in the community
surrounding Rocky Flats. The locations include the Arvada at the Ralston
Recreation Center and Standley Lake
Library; Broomfield at Emerald Park;
Northglenn at the Northglenn
Recreation Center Complex; and

Westminster at the Countryside Recreation Center.

Each ComRad environmental monitoring station is designed to sample the following types of radioactivity: airborne, alpha-emitting particles and airborne, ambient Gamma radiation. Collected air filter samples are analyzed monthly. The monitoring stations also sample for temperature, barometric pressure, humidity, wind speed/direction, and rainfall.

The primary goal of the program is to provide an educational opportunity for local citizens, students and others to learn about the basic concepts of radiation; to learn about the existence, levels and significance of background radiation; and to understand the relative contribution of the Rocky Flats site emissions to total radiation. A second major goal is to provide an opportunity for surrounding communities to independently measure radiation levels at sites in the community, and to obtain data independent of Rocky Flats and the Colorado Department of Public Health and Environment monitoring programs.

For the past several years, the Department of Energy has



ComRad monitoring station in Westminster.

managed the program, hiring one contractor to maintain the stations and another to manage the sample collection, report preparation and public education programs. In assuming management of the program, RFCAB has teamed with representatives of local governments to form the ComRad Oversight Panel.

One of the panel's first decisions was to combine the station maintenance, monitoring and education / outreach programs into one contract. A Request for

Proposals was issued this spring, with five companies submitting proposals. After reviewing the proposals, MERCO, Inc. - a local environmental services company - was awarded the contract and began work in July.

One of MERCO's first tasks will be to evaluate the monitoring stations and make suggestions for upgrading the equipment. MERCO hopes to make all the upgrades by the end of the year. In addition, MERCO, in cooperation with RFCAB and the Oversight Panel, will evaluate the education and outreach programs. The goal is to make the programs more accessible to the community through the use of education programs in schools and community groups, as well as making the monitoring data available over the internet.

RFCAB looks forward to exciting changes and opportunities for the ComRad program. Future updates in *The Advisor* will keep you posted on the program as it evolves. If you have any questions or need more information about the program, please contact Ken Korkia at (303) 420-7855.

## 2006 Baseline (continued from page 1)

In the 2010 baseline, the site had proposed placing four engineered caps over portions of the site, where some contamination would remain. In the 2006 baseline, the site is proposing to reduce the number of locations to three. The site also proposes to change the original design of the cap to one that is better suited to the area climate. Bob Card, vice-president of Kaiser-Hill, has indicated that he does not believe that caps will be necessary inside the protected area onsite. Proposals for capped areas have already met with concern from many in the community.

Kaiser-Hill feels there are still a number of issues to overcome to ensure.

that the 2006 deadline can be met. The site has based this plan on a number of assumptions. If some of these assumptions are not met, it is possible that the 2006 target date cannot be achieved. Some of the major assumptions are:

- 1) The regulatory framework must remain unchanged;
- 2) Waste receiver sites must be available as needed;
- 3) Clean building rubble will be used as a fill material onsite; and
- 4) Union agreements must remain unchanged.

An even more important assumption is that funding will be available at sufficient levels to reach closure by 2006. If this assumption is not met, the site will in all likelihood not reach its goal of closing in 2006.

Several communities, as well as the Citizens Advisory Board, have expressed concerns that accelerating closure might jeopardize worker health and safety, the health and safety of surrounding communities, and the ultimate goal of a complete and thorough cleanup. Kaiser-Hill maintains that acceleration of the cleanup will not compromise any of these goals. The Citizens Advisory Board will continue to monitor cleanup to ensure that workers, the public, and the environment are not placed at risk from the activities at

# Rocky Flats Achieves Major Plutonium Milestone

n July, the Rocky Flats **Environmental Technology Site** completed a major milestone with the shipment of the last plutonium pit from the site. Pits were the major nuclear weapons component produced at Rocky Flats during its 40 years of operation. When the site suspended operations in 1989, an inventory of these pits remained. As during the production era, the majority of the remaining pits were sent to the Pantex facility in Amarillo, Texas. Some special experimental design pits were sent to DOE laboratories in California and New Mexico. In the past, the pits would be assembled into nuclear warheads, but with the end of the Cold War, the newly arrived pits will be put into storage awaiting final disposition. According to the Department of Energy's current plans, it is likely that the pits will be converted into mixed oxide fuel for use in a nuclear power plant.

While the shipment of the pits is a major milestone for Rocky Flats, it is important to note that a large quantity of special nuclear material, both plutonium and highly enriched uranium, remains at the site. This inventory includes raw metal, oxides, residues and wastes. In 1994, then Secretary of Energy Hazel O'Leary announced that the inventory of plutonium at Rocky Flats was just over 14 tons. In June 1998, the Citizens Advisory Board recommended that DOE release revised inventory numbers as a means to let the public know the rate at which the inventory was decreasing. To date, DOE has yet to release such revised inventories.

With the removal of the pits, the next major category of plutonium to leave the site will be the metals and oxides. These are both rather pure forms of plutonium that were once the raw feed materials for fabricating the pits. DOE will send these materials to the Savannah River Site in South Carolina. In its accelerated baseline for site closure, DOE and site contractor, Kaiser-Hill, hope to begin shipment in

2000 and finish in 2002. One issue requiring attention in order to achieve this goal is to obtain enough shipping containers in a timely manner. Similar to the plutonium pits, the purer of these forms are likely to be converted into nuclear power fuel, while the less pure forms will be immobilized in molten glass that will harden and then be disposed of as waste. DOE currently plans to build a waste repository at the Yucca Mountain site near Las Vegas, Nevada for these materials as well as spent nuclear fuel from commercial nuclear power plants.

The final category of plutonium is residues. These residues are leftovers from the manufacturing operations that contain appreciable amounts of plutonium. In the past, DOE was saving these residues to one day extract the plutonium from them. Now they have been judged to be excess materials. DOE has decided that some of the higher concentration materials which pose the greatest risk for exposure to workers handling them will be sent to the Savannah River Site where the plutonium will be extracted. At Savannah River, the extraction is done in large concrete facilities with minimal hands-on worker contact. DOE will likely immobilize the extracted plutonium in glass and dispose of the material. Not all issues have been resolved in order to allow Savannah River to receive these materials, so the site may need to go to a contingency plan that would stabilize the residues at Rocky Flats and dispose of them at WIPP. DOE has determined the residue forms with lesser plutonium concentrations will be disposed of directly in the WIPP facility in New Mexico, without extraction. In fact, the first shipment from Rocky Flats to WIPP was one of these residue forms - graphite molds.

There are other waste forms at Rocky Flats that contain plutonium. All of the transuranic waste that will be shipped to WIPP contains plutonium. Another form is the "holdup" material that was trapped in the ventilation and

drain systems during production operations. The holdup material will need to be removed as part of the decontamination of the buildings and will become waste that will be shipped to WIPP.

Besides plutonium, the site worked with another special nuclear material called highly enriched uranium, both in liquid and solid metallic forms. Two years ago, the last quantity of the liquid forms was drained from storage tanks and shipped to a receiving site in Oak Ridge, Tennessee. Progress has been made in removing most of the metallic forms as well, also to Tennessee. Some of the material still remains, however, because it is "contaminated" with plutonium. The Oak Ridge facility is not licensed to accept plutonium, so the site must decontaminate the material before sending it to Tennessee. With the exception of a small quantity that the site is not able to properly decontaminate, the majority of the shipments will be complete by the end of September 1999.

Removing the special nuclear materials from Rocky Flats will reduce not only health and safety risks, but will decrease the need for security at the site. The cost associated with managing the special nuclear materials is great, so removing these materials in an expedited manner will allow tight budgetary resources to go toward decontamination and demolition of the former production buildings.

The Rocky Flats Citizens Advisory Board supports the expedited shipment of special nuclear materials in order to eliminate a major health and safety risk, and also to achieve closure of the site. Because of the age and condition of the current on-site storage facilities, the Board is concerned that should extended delays occur in removing the materials from the site, the current storage configurations may not be adequate. In that event, the Board has asked DOE to reevaluate its options.

# **Progress Continues to Reduce Other Risks at Rocky Flats**

hile the removal of the plutonium pits is an important step to reduce the risks inherent in the storage of nuclear materials, other steps are being accomplished for risk reduction at the site. One of the most important is the draining of plutonium solutions from tanks and piping.

When Rocky Flats ceased manufacturing operations in 1989, the processing lines were shut down with materials left in many different states. One of the most dangerous forms left were liquids containing plutonium. Normally during production operations, these liquids would remain in the tanks and piping for only the time necessary to complete the processing. Since the end of the production, these solutions have remained

in the tanks and piping, areas that were not designed for longterm storage. Concerns also arise over the stability of these solutions because they have never been stored for such long periods of time.

For the past three years, a major effort at the site has been to drain and stabilized these solutions. Draining the tanks was accomplished over a year ago. What remains are solutions held up in the pipes leading to and from the tanks. In July, Rocky Flats announced that it had completed draining the pipes in one of the two buildings, Building 371, involved in handling plutonium solutions. Workers expect to complete the other facility, Building 771, by the end of this year.

# Special Nuclear Materials Disposition at a Glance

<u>Material</u>	Receiving Site	<u>Status</u>	<u>Comments</u>
PLUTONIUM PITS	PANTEX (AMARILLO, TEXAS)	COMPLETE	ORIGINAL MILESTONE WAS 2015
PLUTONIUM METALS AND OXIDES	Savannah River (South Carolina)	Begin 2000	COMPLETE BY 2002; NEED TO PROCURE MORE CONTAINERS
HIGHLY ENRICHED URANIUM	OAK RIDGE (TENNESSEE)	LIQUID FORMS COMPLETE	MAJORITY OF METAL FORMS HAVE BEEN DECONTAMINATED AND WILL BE SHIPPED BY SEPTEMBER 1999
RESIDUES - NON-SEPARATED	WIPP (New Mexico)	SHIPMENTS BEGAN IN JUNE	WILL NEED TO PROCURE MORE CONTAINERS AND TRUCKS TO MAINTAIN SGHEDULE OF REMOVAL BY 2002
RESIDUES - SEPARATED FORMS	SAVANNAH RIVER (SOUTH CAROLINA)	SHIPMENTS BEGAN THIS YEAR	COMPLETE BY 2002; BACKUP PLAN IS TREATMENT AT
			Rocky Flats or Los Alamos and SHPMENT TO WIFF



# This Issue: Northern New Mexico Citizens Advisory Board

The Rocky Flats Citizens Advisory Board is one of several Site-Specific Advisory Boards (SSABs) that have been formed at former nuclear weapons production sites. In each issue of <u>The Advisor</u>, we spotlight the activities of one of these boards.

os Alamos National Laboratory (LANL) was ✓ established in 1943 as part of the Manhattan Project, which created the first atomic weapons during World War II. The lab is located in northern New Mexico, and is one of 28 DOE laboratories across the country. Its central mission is to enhance the security of nuclear weapons and materials worldwide. The lab also has a statutory responsibility of stewardship and management of the nuclear stockpile. In addition, it manages programs in energy, nuclear safeguards, biomedical science, and environmental protection and cleanup, among others. LANL is the largest insti-

tution and employer in the area – with 6,800 University of California employees, 2,800 contractor employees, and an annual budget around \$1.2 billion.

The original Site-Specific Advisory Board for LANL – called the Northern New Mexico Citizens Advisory Board (NNMCAB) – was created in the fall of 1995. The Board had approximately 20 members, including representatives from three Native American communities surrounding the laboratory. NNMCAB worked as a group through the summer of 1997, when the Board was essentially disbanded. According to M.J. Byrne, DOE's local coordinator for the NNMCAB, because of issues the Department felt were hindering the progress of the Board, DOE at that time chose not to reappoint about one-half of the standing Board members. DOE felt the Board was no longer functioning under its scope or mission – to give recommendations on environmental restoration issues. DOE immediately began recruiting replacement members and



The Main Technical Area (TA-3) at Los Alamos National Laboratory houses many technical laboratories and facilities, where 50% of the lab's employees are located.

a new Board was put in place in mid-1998. However, many from the original Board did not feel DOE had a right to disband the organization and filed a lawsuit against DOE. The judge ruled in favor of the Department of Energy.

In the spring of 1998, the new SSAB for Los Alamos held its first meeting. There were rocky times in the beginning since members of the original Board still opposed the changes made by DOE. However, officers were elected that spring and the Board began an extensive educational process, which continues as more members are added.

Since then, NNMCAB has held several workshops on risk management, and has toured different sites at the laboratory to review projects and become familiar with the areas within the lab's complex. A workshop was also held to gather and share information about the contamination at Mortendad Canyon, an area contaminated with effluent from the liquid waste treatment plant. A NNMCAB committee is tasked with studying and following the contamination in that canyon.

Recommendations made to DOE so far by NNMCAB have focused primarily on the Board's information needs. "The biggest problem we've had is getting useable information in a digestible form – information on where the sites are that are contaminated and what contaminants are found there," said George Chandler, the Board's chair. The Board is starting to get more information, but Mr. Chandler stated they would like access to the contaminant database at LANL to help produce a report the Board can use. The Environmental

(continued on page 7)

## **Meet the Board's Newest Members**



Markuené Sumler. Markuené lives in Broomfield, and is a program administrator at the National Jewish Medical and Research Center in Denver. She also serves as a member on the Board of Directors for the CU-Denver Alumni Association. Markuené has a BS in Biology and an MS in Health Administration.



Jeffrey Eggleston. Jeff is an engineering manager in Research and Development at Valleylab, a medical device manufacturer in Boulder. Jeff has more than 17 years in the health industry designing products used in operating rooms. He has an AB in Biological Sciences, a BSEE in Electrical Engineering, and an MSE in Engineering. He is a resident of Broomfield.

### Northern New Mexico Citizens Advisory Board (continued from page 6)

Restoration Committee is working on this issue, and will try to inventory the sites and find out what kinds of contamination need to be dealt with. The Board's Waste Management Committee continues to track issues about the storage areas at the site.

The Board is now working on its year 2000 work plan. Each committee is assigned with creating its own work plan and a corresponding budget. The first draft was reviewed at NNMCAB's August meeting. The work plan will probably be approved this fall.

Meanwhile, the Department of Energy has had to face challenges of its own. In March, news accounts surfaced telling of the alleged transfer of national security secrets from LANL to China. The espionage is believed to have happened some time in the 1980s, but was not detected by U.S. experts until 1995 when Chinese nuclear test results revealed similarities to advanced miniature warheads made in America. Until that time, Chinese nuclear weapon designs were considered to be at least a generation behind those of the United States.

This breakthrough in weapons design was believed by some officials to have been accelerated by the theft of U.S. nuclear secrets. A suspect was identified – a scientist at Los Alamos. China's technical advance now allows it to make mobile missiles, ballistic missiles with multiple warheads, and small

warheads for submarines – which comprise the key elements to a modern nuclear force.

One month after the reports of espionage hit the news, LANL was one of three sites to receive a rating of "marginal" in a DOE annual security review, indicating improvements were necessary. DOE prepared directives to address those vulnerabilities, with a special emphasis on strengthening the protection of computer systems. The scientist who allegedly transferred secrets to China was believed to have done so by downloading top-secret codes and information from the classified computer system to an unclassified, unprotected computer. DOE shut down computer networks containing the most sensitive nuclear information. Computer networks were re-opened after improvements in electronic security were made.

Wen Ho Lee, the scientist accused of these illegal activities, has denied any wrongdoing. Mr. Lee, a naturalized American citizen born in Taiwan, was dismissed from Los Alamos in March. The Justice Department is still considering whether to press charges against him.

To find out more information about Los Alamos National Laboratory, visit its website: http://www.lanl.gov/worldview/

The Northern New Mexico Citizens Advisory Board also has a web address: http://www.nnmcab.org/

#### RFCAB Website: www.rfcab.org

The Advisor is published quarterly by the Rocky Flats Citizens Advisory Board (RFCAB). The Executive Editor is Jim Kinsinger. Please send your questions, suggestions and ideas to:

Erin Rogers, Managing Editor Rocky Flats Citizens Advisory Board 9035 Wadsworth Parkway, Suite 2250 Westminster, CO 80021

Phone: (303) 420-7855 / Fax: (303) 420-7579

E-mail: rfcab@indra.com

Except as noted, all articles are written by RFCAB staff: Ken Korkia, Erin Rogers, Deb Thompson and Brady Wilson. To request a change of address or to add or remove your name from the mailing list, contact Deb Thompson at the above address and phone number. Material may be reprinted if credit is given. RFCAB is funded under a 1999 grant of approximately \$300,000 sponsored by the U.S. Department of Energy.

#### RFCAB MISSION STATEMENT

The Rocky Flats Citizens Advisory Board, a nonpartisan, broadly representative, independent advisory board with concerns related to Rocky Flats activities, is dedicated to providing informed recommendations and advice to the agencies (Department of Energy, Colorado Department of Public Health and Environment and the Environmental Protection Agency), government entities and other interested parties on policy and technical issues and decisions related to cleanup, waste management and associated activities. The Board is dedicated to public involvement, awareness and education on Rocky Flats issues.

## Rocky Flats Public Meeting Calendar

Sep	otember		
2	Rocky Flats Citizens Advisory Board Work Session	6 - 9:30 p.m.	College Hill Library
8	Rocky Flats Soil Action Levels Oversight Panel Public Meeting	6:30 - 9 p.m.	Broomfield City Hall
9	Rocky Flats Soil Action Levels Oversight Panel	4 - 7:00 p.m.	Broomfield City Hal
Oct	tober		<del></del>
7	Rocky Flats Citizens Advisory Board Work Session	6 - 9:30 p.m.	College Hill Library
14	Rocky Flats Soil Action Levels Oversight Panel	4 - 7:00 p.m.	Broomfield City Hal
	vember		
4	Rocky Flats Citizens Advisory Board Work Session	6 - 9:30 p.m.	College Hill Library

ALL MEETINGS ARE SUBJECT TO CHANGE, PLEASE CALL BEFORE YOU GO -- (303) 420-7855

College Hill Library, Front Range Community College, 3705 West 112th Avenue, Westminster Broomfield City Hall, One Descombes Drive

Rocky Flats Citizens Advisory Board 9035 Wadsworth Parkway, Suite 2250 Westminster, CO 80021

**Address Service Requested** 

NONPROFIT ORG.
U.S. POSTAGE
PAID
Broomfield, CO 80021
Permit No. 20

The Advisor is printed with soy-based inks on 60% recycled paper (30% post-consumer)

